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2 **MOUZIS CRIMINAL DEFENSE**
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8 Attorney for Defendant
9 **STEVEN DANIEL WOODS**

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

12 **UNITED STATES OF AMERICA,) 2:21-cr-00100-JAM**
13) Plaintiff,) **STIPULATION AND ORDER**
14 **v.) TO CONTINUE JUDGMENT**
15) AND SENTENCING
16 **STEVEN DANIEL WOODS,)**
17) Defendant.)
18 _____)

19 **STIPULATION**

20 Plaintiff, United States of America, by and through its counsel, Assistant United States
21 Attorney Ross Pearson, and defendant, Steven Daniel Woods, by and through his counsel,
22 Jennifer Mouzis, agree and stipulate to vacate the date set for judgment and sentencing, May 21,
23 2024 at 9:00 a.m., in the above-captioned matter, and to continue the judgment and sentencing to
24 September 24, 2024 at 9:00 a.m. in the courtroom of the Honorable John A. Mendez. Federal
25 Probation Officer, Janice Slusarenko, also agrees to this change.

26 In addition, the parties stipulate to the following modification to the schedule of
27 disclosure relating to the pre-sentence report (“PSR”):

28 Proposed Pre-Sentence Report August 13, 2024

1 Written objections to the PSR August 27, 2024
2 Final PSR September 3, 2024
3 Formal objections to PSR September 10, 2024
4 Reply, or Statement of Non-Opposition September 17, 2024
5
6 Mr. Woods was interviewed by Probation on April 29, 2024 with counsel present.

7 Counsel is currently assigned to trial in two matters (*People v. Singh*, Butte County Superior
8 Court case number 21CM02348 and *People v. Cummings*, Stanislaus Superior Court case
9 number CR-20-010085). These trials are expected to conclude late June or early July 2024. Once
10 counsel is out of trial, she requires the requested time to gather and present mitigation evidence
11 on behalf of Mr. Woods.

12 Accordingly, the parties respectfully request the Court adopt this proposed stipulation.

13 IT IS SO STIPULATED.

14 Dated: May 13, 2024 PHILLIP A. TALBERT
15 United States Attorney

16 By: /s/ Ross Pearson
17 ROSS PEARSON
Assistant United States Attorney

18 Dated: May 13, 2024 /s/ Jennifer Mouzis
19 JENNIFER MOUZIS
20 Attorney for Defendant
21 STEVEN DANIEL WOODS
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ORDER

For the reasons set forth in the accompanying stipulation, the judgment and sentencing date of May 21, 2024, at 9:00 a.m. is **VACATED** and the above-captioned matter is set for judgment and sentencing on **September 24, 2024, at 9:00 a.m.**

It is FURTHER ORDERED that the schedule of disclosure be modified as follows:

Proposed Pre-Sentence Report **August 13, 2024**

Written objections to the PSR **August 27, 2024**

Final PSR **September 3, 2024**

Formal objections to PSR **September 10, 2024**

Reply, or Statement of Non-Opposition **September 17, 2024**

IT IS SO ORDERED.

Dated: May 15, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE